In conclusion and in accordance with Chapter 94, Section 94.51, we hereby request that the Cumberland Township Authority be granted an exception of any restrictions on future sanitary sewer connections for the following reasons; (1) Township has completed the 537 Facilities Plan, (2) the Cumberland Township Authority has completed a significant portion of sanitary sewer reconstruction in 1998, (3) the Municipal Authority is expecting to have an enlarged wastewater treatment facility on line in accordance with the schedule as provided herein, and (4) although flows occasionally exceed design capacity, treatment efficiency continues to exceed that required by the NPDES permit, except for phosphorus.

In the last three years, the average 3-month peak flow has only exceeded the design flow once and that year the annual precipitation was over 20 inches above normal. Even so, in 1996 the peaking factor (1.18) was less than in 1993 (1.48) and 1994 (1.36) when precipitation was only slightly above normal. This seems to be an indication that improvements in the collection system have reduced infiltration and inflow.

Continued growth in Cumberland Township is needed to help offset the costs of the plant expansion. Connection fees can be used to reduce the capital costs of the project and additional users disperse the annual costs, reducing the cost to the individual user. Therefore the Cumberland Township Authority hereby requests that the PA DEP approve the request to authorize the issuance of permits for the equivalent of 45 EDU's.

